IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION



IN RE:	§	G 37 04 4000
JOSEPH ANTHONY DOWDALL,	§ §	Case No. 24-42950
Debtor.	§ 8	Chapter 7
Detion.	§ §	
MMWKM ADVISORS, LLC,	§ §	
Plaintiff,	§ 8	Adversary No. 25-04025
Tidilitiii,	§ §	Adversary 140. 23 04023
V.	§ §	
JOSEPH ANTHONY DOWDALL,	§ 8	
Defendant.	§ §	

DECLARATION OF PATRICK YARBOROUGH

My name is Patrick Yarborough. My date of birth is June 5, 1985, I represent the Plaintiff, MMWKM Advisors, LLC, in the above-captioned cause, and am in all ways competent to provide testimony in this Declaration, which I make based on my own personal knowledge:

1. In the evening of April 24, 2025, I finished drafting a sixteen-page Complaint to Determine Dischargeability seeking denial of discharge, including Count III pursuant to 11 U.S.C. § 727(a)(2) alleging, in part, that "Debtor has, with intent to hinder, delay, or defraud a creditor or an officer of the Estate, transferred, removed, destroyed, mutilated, or concealed, or have permitted to be transferred, removed, destroyed, mutilated, or concealed, property of the Debtor, within one (1) year before the date of the filing of the petition and/or property of the Estate, and after the date of the filing of the petition." Dkt. No. 1, at ¶ 417 (Plaintiff's Complaint to Determine Dischargeability).

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- Declaration of Patrick Yarborough Page 2 of 2

2. As the midnight deadline approached on April 24, 2025, I began the process of effiling this Complaint with the Court and, based on my e-filing experience, anticipated having ample time to complete e-filing before midnight. However, I did not anticipate that it would be necessary to open a new adversary case in order to file this Complaint. As a result, it took a few minutes longer than anticipated for me to complete the filing, and the Complaint was not filed until 12:07 A.M. (CST) on April 25, 2025, seven minutes after the deadline had passed.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 22, 2025.

Patrick Yarborough